

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

Case:2:09-cr-20605

Judge: Zatkoff, Lawrence P

MJ: Komives, Paul J

Filed: 12-15-2009 At 04:54 PM

INDI: USA V. DEIDRA LUCAS (KB)

D-1 DEIDRA LUCAS,

Defendant.

VIOLATIONS:

Embezzlement of Union Assets  
29 U.S.C. § 501(c)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(29 U.S.C. § 501(c) – Embezzlement of Union Assets)

D-1 DEIDRA LUCAS

From on or about January 31, 2005, to on or about March 23, 2006, in the Eastern District of Michigan, DEIDRA LUCAS, Defendant herein, while acting as President of American Federation of State, County and Municipal Employees (AFSCME) Local 100, a labor organization engaged in an industry affecting interstate commerce, did engage in an ongoing scheme where she embezzled, stole and unlawfully and willfully abstracted and converted to her own use, the moneys, funds, securities, property or other assets of said labor

organization by making unauthorized cash withdrawals from the union's checking and savings accounts, in the approximate amount of Five Thousand Two Hundred Eighty Three and 20/100 Dollars (\$5,283.20).

All in violation of Title 29, United States Code, Section 501(c).

**COUNT TWO**  
**(29 U.S.C. § 501(c) – Embezzlement of Union Assets)**

D-1 DEIDRA LUCAS

From on or about December 21, 2004, to on or about June 2007, in the Eastern District of Michigan, DEIDRA LUCAS, Defendant herein, while acting as President of American Federation of State, County and Municipal Employees (AFSCME) Local 100, a labor organization engaged in an industry affecting interstate commerce, did engage in an ongoing scheme where she embezzled, stole and unlawfully and willfully abstracted and converted to her own use, the moneys, funds, securities, property or other assets of said labor organization by falsely claiming and receiving unauthorized dues reimbursement payments and officer stipend payments from the union, in the approximate amount of One Thousand Five Hundred Fifty Dollars (\$1,550.00)

All in violation of Title 29, United States Code, Section 501(c).

**COUNT THREE**

**(29 U.S.C. § 501(c) – Embezzlement of Union Assets)**

D-1 DEIDRA LUCAS

From on or about December 21, 2004, to on or about July 17, 2007, in the Eastern District of Michigan, DEIDRA LUCAS, Defendant herein, while acting as President of American Federation of State, County and Municipal Employees (AFSCME) Local 100, a labor organization engaged in an industry affecting interstate commerce, did engage in an ongoing scheme where she embezzled, stole and unlawfully and willfully abstracted and converted to her own use, the moneys, funds, securities, property or other assets of said labor organization by falsely claiming and receiving unauthorized lost time payments from the union, in the approximate amount of Twenty Four Thousand Three Hundred Fifty One and 50/100 Dollars (\$24,351.50)

All in violation of Title 29, United States Code, Section 501(c).

**COUNT FOUR**

**(29 U.S.C. § 501(c) – Embezzlement of Union Assets)**

D-1 DEIDRA LUCAS

From on or about December 21, 2004, to on or about May 24, 2007, in the Eastern District of Michigan, DEIDRA LUCAS, Defendant herein, while acting as President of American Federation of State, County and Municipal Employees (AFSCME) Local 100, a labor organization engaged in an industry affecting interstate commerce, did engage in an

ongoing scheme where she embezzled, stole and unlawfully and willfully abstracted and converted to her own use, the moneys, funds, securities, property or other assets of said labor organization by falsely claiming and receiving unauthorized petty cash reimbursement from the union, in the approximate amount of Eight Thousand Two Hundred Nineteen and 02/100 Dollars (\$8,219.02)

All in violation of Title 29, United States Code, Section 501(c).

THIS IS A TRUE BILL.

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

TERRENCE BERG  
United States Attorney

s/James M. Wouczyna  
JAMES M. WOUCZYNA (P22562)  
Assistant United States Attorney  
211 W. Fort St., Ste. 2001  
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DATED: December 15, 2009

United States District Court  
Eastern District of Michigan

**Criminal Case Cover**

**Case: 2:09-cr-20605**  
**Judge: Zatkoff, Lawrence P**  
**MJ: Komives, Paul J**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [Yes]

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>JKM</i>

Case Title: USA v. D-1 DEIDRA LUCAS

County where offense occurred : Oakland

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☒ **Indictment — no prior complaint.**

☐ Indictment based upon prior complaint [Case number: \_\_\_\_\_]

☐ Indictment/ \_\_\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Original case was terminated; no additional charges or defendants.  
☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

December 15, 2009  
Date

*James M. WoucZYNA*  
\_\_\_\_\_  
JAMES M. WOUCZYNA (P22562)  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.